



*United States Attorney  
Eastern District of New York*

AAS (Rule 16 letter #5)  
F.#2007R000229

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 13, 2008

**BY FACSIMILE AND ECF**

Gerald L. Shargel, Esq.  
570 Lexington Avenue  
New York, New York 10022

Re: United States v. Ricardo Fanchini  
Criminal Docket No. 07-736 (S-1)(CPS)

Dear Mr. Shargel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-referenced matter. The government reiterates its requests for reciprocal discovery.

Available for your review are copies of certain trial exhibits from United States v. David Batashvili, et al., CR 93-190 (CRH), including:

1. Passports for Michail Lemberg, Serafima Lemberg, Zoya Iskhak, and Svetlana Shkolnik;
2. Various customs declarations for Dmitry Karpovich, David Batashvili, Joseph Chicareli, Jorge Pemberton, Yakov Bachakashvili, Shuza Milman, Michail Lemberg, Serafina Lemberg, Zoya Iskhak, and Ronald Trudel;
3. Various travel documents for Jacob Bachashvili and Yakov Bachakashvili;
4. Various airline passenger lists;
5. Various flight itineraries for David Batashvili, Dmitry Karpovich, Joseph Chicareli, Yakov Bachakashvili, Svetlana Shkolnik, Shura Milman, Zoya Iskhak, Michael Vax, Frank Bachrach, Veikko Ahvenainen, Vasily Aleshin, Dmitry Batashvili, Hans Taussig, Ada Todd, Ronald Trudel, Serafima Lemberg, Boris Mogorichev, Leonid Mogorichev, Larisa Nechayev, Igor Pavlov, Oleg Krupnik, Edmund Velten, Jorge Pemberton, David Podlog, Daniel Shamail, Alexander Shkolnik, David Shuster, Vagan Stepanian, Leonard Swerdloff, Monya Elson, John

Ferrante, John Ferranti, Aleksandr Gertsenhteyn, Sylwester Gniazdowski, Mels Iskhak, Peter Kamm, Luba Karpovich, Oleg Kolesnitchenko, Tatiana Kolesnitchenko, Felix Komarov, David Markov, Alla Markov, Mikhail Markov, David Mikhelashvili, Lily Misakyants, Oleg Belenitsky, Alexander Bogomolov, Ilya Bondar, Jerry Caldari, and Valeri Drabkin;

6. Various receipts for David Batashvili, Svetlana Shkolnik, Frederick Dixon, Ronald Trudel, Serafina Lemberg, Jorge Pemberton, Luba Karpovich, Dmitry Karpovich;
7. Checkbook for Serafima and Michael Lemberg;
8. Money transfer slips to David Batashvili and Jeff Chicareli;
9. Photographs of packaging materials and narcotics;
10. Photographs of "Hot Bagels" store;
11. Photographs of various subjects walking;
12. Credit card statement for Venera Batashvili;
13. Various business cards, some of which bear handwritten notes;
14. Traffic citation for David Batashvili;
15. Various phone number ledgers;
16. California driver's license for David Batashvili;
17. American Airlines frequent flier card for David Batashvili;
18. Transcript of a postal delivery to Jonathan Sadov;
19. Transcripts of meetings dated March 12, 1992 (2), March 25, 1992, March 26, 1992 (2), April 2, 1992, February 4, 1993;
20. Miscellaneous document concerning Batashvili and Ichikaraly;

21. Listing of GWK offices in the Netherlands with handwritten notes;
22. Chart of miscellaneous telephone calls between April 17, 1991 and February 4, 1993;
23. Audio cassette recordings dated February 4, 1993, May 11, 1993, and a microcassette recording, dated February 4, 1993; and
24. Various phone records for the numbers 212-615-2099, 917-763-5453, 213-653-2167, 213-300-2702, 213-653-0571, 212-995-0072, 212-993-0002, 212-271-2250, 212-995-1438, 212-592-3845, 218-591-3380, 203-368-0906, 718-459-2714, 718-714-1522, 218-760-5518, 718-714-1238, 718-830-0121, 718-592-3845, 718-592-3845, 212-995-0072, 213-300-2702, 718-847-7560, 718-645-0117, 718-225-7815, 718-805-5871, 716-886-3264, 718-591-3380, 718-459-2714, 212-995-0072, and 718-553-0380.

You may request copies of the above-described documents/items by contacting **Joe Meisner at First Choice Copy, telephone number (718) 381-1480, extension 212, and asking for print number (86125)**. Only counsel of record or someone from his or her office will be permitted to obtain the documents.

The government is in possession of additional non-narcotic, tangible evidence from the Batashvili matter which it may seek to introduce at trial, including, but not limited to, passports referenced earlier, travel documents referenced earlier, photographs referenced earlier, photographic negatives, packaging materials, a personal phonebook, and a checkbook. As additional documentary evidence becomes available, it will be disclosed in discovery. All other tangible items described above can be inspected at our Offices by appointment.

The government also hereby produces a compact disk containing Spanish translations of conversations between a CI and Roberto Alcaino recorded in 2007, the original Spanish audio having already been produced. Further, the government hereby produces documents obtained from Belgium, mostly in Flemish, relating to the defendant's prior Belgian criminal conviction for money laundering. Moreover, the government hereby produces approximately 245 audio cassette tapes from court-authorized wiretaps of telephones utilized by Boris Nayfeld and David Padlog during approximately 1990 and 1991. The government also hereby produces an English translation linesheet of two court-authorized wiretaps in Uruguay involving the defendant. You may request

copies of the above-described documents/items by contacting **Joe Meisner at First Choice Copy, telephone number (718) 381-1480, extension 212, and asking for print number (86125).** Only counsel of record or someone from his or her office will be permitted to obtain the compact disks and documents.

If you have any questions or further requests, please do not hesitate to call me.

Very truly yours,

BENTON J. CAMPBELL  
United States Attorney

By:           \s\            
Steven Tiscione  
Toni M. Mele  
Licha M. Nyiendo  
Alexander A. Solomon  
Assistant U.S. Attorneys  
(718) 254-6317/6138/6350/6074

cc: Clerk of Court (CPS)(w/o enclosures)